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CRIMINAL LAW—SUFFICIENCY OF INDICTMENT CHARGING BURGLARY OF "GARAGE" WITHOUT FURTHER DEFINING IT.—An indictment for burglary, charging that the defendant broke into a named person's private garage, without further defining the word "garage" or affirming same to be a building, which indictment conformed in every particular to the statute under which drawn, was objected to on the ground that the crime was charged with insufficient certainty. *Held*, indictment sufficient. *Taylor et al. v. State* (Ind.), 132 N. E. 294 (1921).

When real property is the subject of an offense charged, the premises must be described with sufficient particularity to identify it, and to show the character, ownership, or occupancy of the premises to be such as could be the subject of the offense whether at common law or under statute. *State v. Atkinson*, 88 Wis. 1, 58 N. W. 1034 (1894); *Thomas v. State*, 97 Ala. 3, 12 So. 409 (1893); *Com. v. Brown*, 15 Gray (Mass.) 189 (1860); *People v. Warner*, 25 Cal. App. 751, 145 Pac. 545 (1914). In an indictment for burglary of a chicken house it has been held to be sufficiently described though not alleging that the house was specially for the keeping of such goods of value according to the terms of the statute, such being implied by the descriptive words. *Lucas v. State*, 144 Ala. 63, 39 So. 821, 3 L. R. A. (N. S.) 412 (1905). Where the statute used the word "shop" and the indictment alleged the entry of a "store" the description was deemed sufficient. *State v. Moore*, 38 La. Ann. 66 (1886). Again it was held that an indictment under statute for breaking and entering a "place of business" need not expressly denominate it as such if the description shows it to be of such a nature. *Jones v. State*, 12 Ga. App. 813, 78 S. E. 474 (1913). A descriptive word certain in its meaning by common acceptance is sufficient, as where the word "house" was used instead of the usual "dwelling house" in an indictment for burglary. *Thompson v. People*, 3 Park. Crim. (N. Y.) 208 (1856).

WEBSTER defines a "garage" as a *place for housing automobiles*. The STANDARD DICTIONARY says a garage is a *building for the storage of automobile vehicles*.

See VA. CODE, 1919, §§ 4437-4439; by the words "or other house" contained therein, the indictment would seem to be alleged with sufficient certainty to bring the case within the statute, invoking the doctrine of *ejusdem generis*.

INJUNCTIONS—PICKETING.—Plaintiff lowered the wages of its employees and refused to recognize organized labor as such for the purpose of discussing a raise in wages. As a result of this the defendant Union issued a strike order against the plaintiff. Members of the defendant Union were placed as pickets in groups of from 4 to 12 men in the street through which the employees of the plant, against which the strike was declared, had to pass to and from work. Much disorder resulted and several of the employees were assaulted and injured by the pickets. Plaintiff filed a bill to enjoin defendants from carrying on a conspiracy to prevent plaintiff from retaining and obtaining skilled laborers to operate their plant, by picketing accompanied by threats, intimidation